

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)

In re:)
)
DAVID DRUGS) Case No. 18-12699-LSS
) Chapter 7
Debtor.)

**TRUSTEE'S SUPPLEMENT TO APPLICATION
FOR AUTHORITY TO DESTROY RECORDS**

COMES NOW, Steven H. Greenfeld, Trustee (the "Movant"), by and through counsel, Cohen Baldinger & Greenfeld, LLC, and in response to the Objection of the United States Trustee to the Trustee's Application for Authority to Destroy records, states:

1. The Trustee filed an Application seeking the authority to remove and destroy an estimated 800-900 boxes of customer records which the Debtor maintained in the basement of its location in District Height, Maryland.

2. The United States Trustee filed a response requesting that the Trustee provide more information about his request.

3. The following are the Trustee's responses to the issues raised by the U.S. Trustee;
(A) **Who will be removing and destroying the records?**

The Trustee intend to use *Dump & Junk*, an entity owned and operated by Rich Miller. Mr. Miller is entirely unrelated to the bankruptcy estate herein and was referred by another Chapter 7 Trustee, Michael Wolff, who had retained his company to provide similar services in the case of *FirstPay, Inc.* (Case No. 03-30102).

(B) **How will the records be destroyed in order to protect
"personally identifying information"?**

Dump & Truck will bring a large paper shredder to the Debtor's premises and all of the records will be shredded before being removed from the premises. Then Dump & Truck will dispose of the shredded papers by taking them to their recycling plant.

(C) ***How will the cost to the estate be calculated?***

Dump & Truck will be paid seven dollars (\$7.00) per box, which the Trustee believes will result in a total cost of slightly less than six thousand dollars (\$6,000.00). The Trustee spoke to several other entities providing similar services. Each one charged by the pound and would require the Trustee to move all 800-900 boxes from the basement to street level. The estimated costs for the removal of the boxes using these entities exceeded ten thousand dollars (\$10,000.00).

4. With this supplement, the Chapter 7 Trustee is submitting a consent order that has been executed by himself and the United States Trustee.

WHEREFORE it is prayed that this Honorable Court enter an Order authorizing the Trustee to destroy the old records and granting such and further relief as is just.

COHEN BALDINGER & GREENFELD, L.L.C.

By:s/ Steven H. Greenfeld
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of June, 2018, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Supplement, will be served electronically via the Court's CM/ECF system on the following:

Catherine Hopkin, Esq.
Counsel for the Debtor

I HEREBY FURTHER CERTIFY that on the 1st day of June 2018, a copy of the foregoing Supplement was also mailed, first class mail, postage prepaid to:

Jeanne M. Crouse, Esq.
Office of the U.S. Trustee
Suite 600
6305 Ivy Lane
Greenbelt, MD 20770

/s/ Steven H. Greenfeld
Steven H. Greenfeld